



Alliance for Telecommunications
Industry Solutions

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Ordering and Billing
Forum

A Forum of the Carrier Liaison Committee

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Common Carrier Bureau
Network Services Division
Office of the Chief

95-155

Ms. Diane Griffin Harmon
Acting Division Chief
Network Services Division
Common Carrier Bureau
445 12th Street, SW
Suite 6-A420
Washington, DC 20554

Re: FCC Directive to DSMI regarding the Disconnect and Suspend
Status Functions (DA-00-2754) and the Resulting Telcordia
Implementation Plan

Dear Ms. Harmon:

The SMS/800 Number Administration Committee ("SNAC") would like to thank the FCC for considering and granting the extension to implement the changes outlined in the Disconnect Suspend Status Directive DA-00-2754, letter to DSMI dated December 7, 2000. The Committee shares the Commission's concerns stated in paragraph 2 of the directive regarding the potential violation of Federal Regulations.

Over the past several months, the SNAC has been working diligently with the SMT, DSMI and Telcordia to design and implement the changes directed by the FCC. As a result of the Committee's extensive design discussions, it was concluded that the proposed software changes, if implemented, would negatively impact toll free subscribers and will not adequately address the FCC's concerns. Please refer to Attachment A to this letter for a more detailed explanation of those negative impacts.

Given the negative impacts identified, as well as, the likelihood that the current proposed solution will not resolve the Commission's concerns, the Committee is suggesting alternative solutions that will satisfy the Commission's concerns without impacting toll free subscribers. Again, please refer to Attachment A to this letter for a more detailed explanation of the alternative solutions. We are requesting that the FCC review these solutions and provide for an extension of the implementation date allowing additional time to finalize the design and implement (e.g., individual RespOrg design, coding and testing) the alternative solutions. The additional time would be approximately six months from the date the design is finalized. The SNAC believes that the design for the alternative solutions could be reviewed as early as June 15, 2001.

In the event the Commission would like to proceed with the current proposed solution, the SNAC is requesting an additional three-month extension from the established implementation date of August 6, 2001. This additional time will be used to address the negative impacts and finalize the proposed design. This three-month push could possibly result in an implementation date as early as November 6, 2001.

As you may recall, in the January 31, 2001 letter from the OBF to Charles Keller, Chief Network Services Division, the Committee asserted that "if the requirements were delivered to the Industry by March 2, 2001, testing could begin on June 1, 2001 with an implementation date set for September 1, 2001." The industry is expecting delivery of the final requirements on June 4, 2001, and it is this change in the timeline that has prompted the Committee's request for an additional three-month extension.

With respect to the June 15, 2001 date for design review of the alternative solution, as well as, the June 4, 2001 date for the final requirements of the current proposed solution, it deserves mention that certain variables exist that could impact those dates. For example, the normal sequence of events includes multiple stages of design finalization between the Industry and Telcordia. A later design finalization delivery date, in either case, could potentially push out the implementation date into the busy holiday season, having a negative impact on merchant toll free subscribers and their customers. Accordingly, the Committee is requesting that the Commission respond to the Committee's request to proceed with the alternative solution, and then extend the implementation deadline to a date yet to be decided based on the progress of the finalized designs. The extended implementation date is desired whether or not the Commission approves the alternative proposal for the reasons stated above. The Committee would undertake a periodic status report to the Commission regarding the design finalization allowing for a determination on the implementation date.

Should the Commission staff find a further explanation or presentation helpful regarding the alternative solutions or the necessary three-month extension for implementation of the current proposed solution, the SNAC would welcome the opportunity to establish a meeting or conference call. In any event, and given the impending date set for implementation, the SNAC would appreciate a response from the Commission as soon as possible.

Questions regarding this matter should be directed to Pat Parker, SNAC Co-lead at 972-615-8384, Leslee Strohm, SNAC Co-lead at 720-540-1535 or Megan Campbell, ATIS General Counsel at 202-434-8847.

Sincerely,



Stephanie Cowart
OBF Moderator

Attachment

Cc: Martha Huizenga, OBF Assistant Moderator
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Megan Campbell, ATIS General Counsel
John Pautlitz, Director, Industry Forums
Leslee Strohm, SNAC Co-Lead
Pat Parker, SNAC Co-Lead
Deseree Herring, SNAC Administrator

ATTACHMENT A

| Federal Regulation Reference | | Solution Prescribed by the FCC in the Directive Dated December 7, 2000. | Review of Prescribed Solution | Alternative Solution Suggested |
|------------------------------|---|--|---|--|
| 47 C.F.R., Section 52.103 | Provide only for numbers to be returned to Spare status when subscribers no longer use them | (1) Ensure that a number in Disconnect Status cannot be changed by the managing RespOrg to any status but Spare Status. | <p>The committee has recently experienced issues in Help desk support, where all RespOrg requests were put behind service outages and delayed for an entire business day. An entire business day to change a number from Disconnect to Working status would be unacceptable to our subscribers, even if the request came from the subscriber in error.</p> <p>In addition, if a large volume of numbers need to be returned to Working status, the Help Desk could not process these requests in a timely and fair manner because the industry practice of 'first in/first out' would no longer apply (for example a consolidation of companies where several numbers are to be disconnected and several are to remain working).</p> <p>In the event that the FCC would like to track and manage this process, we would like to do this in an automated and systematic method (<i>see Alternative Solution column</i>).</p> | <ol style="list-style-type: none"> 1. Systematic method for returning numbers to working status in the event of exceptions (RespOrg will be required to enter data elements necessary in lieu of the Help Desk override solution). 2. The SMS/800 will monitor Disconnect to Working transactions by RespOrg for a twelve-month period and provide a report back to the FCC. This will enable the RespOrgs as well as the SMT to measure the effectiveness of the Implemented changes. |
| 47 C.F.R., Section 52.101 | Do not provide for toll-free numbers to be transferred directly from one subscriber to another. | (2) Ensure that a number in Suspend status cannot be changed by the managing RespOrg to any status but Working Status for the same subscriber. | The committee reviewed potential systematic solutions to identify 'subscriber' in the SMS/800 system. 'Subscriber' is not currently stored in SMS/800 and cannot be clearly defined as the 'subscriber' as it is relative to Legal association/entity, mergers, etc. We also considered using termination to identify subscriber, however SMS/800 doesn't necessarily route the calls to the subscriber, and even if it did, a change in termination doesn't mean a change in subscriber. | <ol style="list-style-type: none"> 1. There is no systematic method for disallowing a transfer between subscribers due to the issues identified in the previous column. |

**ATTACHMENT A
(CONT'D)**

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|---------------------------------|---|---|---|--|
| 47 C.F.R., Section 52.103 | Provide only for numbers to be returned to Spare status when subscribers no longer use them | (3) Ensure that an over-ride capability is provided enabling the SMS/800 Help Desk to correct errors or assist a RespOrg in managing a number, if properly requested by the RespOrg | <p>The committee has recently experienced issues in Help desk support, where all RespOrg requests were put behind service outages and delayed for an entire business day. An entire business day to change a number from Disconnect to Working status would be unacceptable to our subscribers, even if the request came from the subscriber in error.</p> <p>In addition, if a large volume of numbers need to be returned to Working status, the Help Desk could not process these requests in a timely and fair manner because the industry practice of 'first in/first out' would no longer apply (for example a consolidation of companies where several numbers are to be disconnected and several are to remain working).</p> <p>In the event that the FCC would like to track and manage this process, we would like to do this in an automated and systematic method (<i>see Alternative Solution column</i>).</p> | <ol style="list-style-type: none"> 1. Systematic method for returning numbers to working status in the event of exceptions (RespOrg will be required to enter data elements necessary in lieu of the Help Desk override solution). 2. The SMS/800 will monitor Disconnect to Working transactions by RespOrg for a twelve-month period and provide a report back to the FCC. This will enable the RespOrgs as well as the SMT to measure the effectiveness of the Implemented changes. |
| 47 C.F.R., Section 52.103 | Prohibit selling a toll free number for a fee. | No solution prescribed by the FCC. | No review of prescribed solution | <ol style="list-style-type: none"> 1. The Committee assumes that the FCC will utilize penalization already defined in the FCC regulations. |